

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

RICHARD MICHAEL BUNDRA II : **VIOLATIONS:**
18 U.S.C. § 371 (conspiracy to commit
armed bank robbery - 1 count)
18 U.S.C. § 2113(d) (armed bank robbery
- 2 counts)
18 U.S.C. § 924(c) (using a firearm during
a crime of violence - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about November 26, 2003, at Lehigh County, Pennsylvania, in the
Eastern District of Pennsylvania, defendant

RICHARD MICHAEL BUNDRA II,

conspired and agreed together with another individual known to the United States Attorney as
“PKL,” to commit an offense against the United States, that is, to knowingly and unlawfully
commit armed bank robbery.

In violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

1. It was part of the conspiracy that the defendant RICHARD MICHAEL BUNDRA II agreed with PKL to commit an armed bank robbery at the Sovereign Bank, located at 1240 Third Street in Whitehall, Pennsylvania, a financial institution the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC).

OVERT ACTS

In furtherance of the conspiracy, the defendant committed the following overt acts in the Eastern District of Pennsylvania:

1. On or about November 26, 2003, defendant RICHARD MICHAEL BUNDRA II and PKL went together and entered the Sovereign Bank, located at 1240 Third Street in Whitehall, Pennsylvania, for the purpose of committing an armed bank robbery.

2. On that date, defendant RICHARD MICHAEL BUNDRA II entered the bank wearing camouflage clothing and a black ski mask, while in possession of and brandishing a firearm, that is, a .38 cal. black revolver. BUNDRA brandished the firearm by pointing it at the tellers and customers and ordering them at gunpoint to put their hands up.

3. On that date, while defendant RICHARD MICHAEL BUNDRA held the tellers and customers at gunpoint, PKL vaulted the teller counter and stole money from bank teller drawers.

4. Defendant RICHARD MICHAEL BUNDRA II and PKL stole approximately \$21,416 in U.S. currency from the Sovereign Bank as a result of the armed robbery.

5. Defendant RICHARD MICHAEL BUNDRA II and PKL used a 1985 gray Cadillac El Dorado as the getaway car to escape from the scene after committing the armed bank robbery.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about November 26, 2003, at Whitehall Township, in the Eastern District of Pennsylvania, defendant

RICHARD MICHAEL BUNDRA II

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Sovereign Bank, located at 1240 Third Street in Whitehall, Pennsylvania, lawful currency of the United States, that is, approximately \$21,416 belonging to, and in the care, custody, control, management and possession of Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant **RICHARD MICHAEL BUNDRA II** knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Sovereign Bank, and other persons, by use of a dangerous weapon, that is, a firearm described as a .38 cal. black revolver.

In violation of Title 18, United States Code, Section 2113(d).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about December 23, 2003, at Whitehall Township, in the Eastern District of Pennsylvania, defendant

RICHARD MICHAEL BUNDRA II

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the National Penn Bank, located at 3670 MacArthur Road in Whitehall, Pennsylvania, lawful currency of the United States, that is, approximately \$5,762 belonging to, and in the care, custody, control, management and possession of National Penn Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant **RICHARD MICHAEL BUNDRA II** knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of National Penn Bank, and other persons, by use of a dangerous weapon, that is, a simulated handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about November 26, 2003, at Whitehall Township, Pennsylvania, in the Eastern District of Pennsylvania, the defendant

RICHARD MICHAEL BUNDRA II

knowingly used, and carried a firearm, that is, a .38 cal. black revolver, during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, that is, armed bank robbery of the Sovereign Bank, located at 1240 Third Street in Whitehall Pennsylvania, in violation of Title 18, United States Code, Section 2113(d), as charged in this Information.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

PATRICK L. MEEHAN
United States Attorney